


ORIGINAL

Approved: 

CAMILLE L. FLETCHER
Assistant United States Attorney

Before: HONORABLE SARAH L. CAVE
United States Magistrate Judge
Southern District of New York

22 Mag. 7022

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: UNITED STATES OF AMERICA : COMPLAINT
: :
: - v. - : Violations of 21 U.S.C.
: : §§ 841, 846, and 2
: PAUL CHRISTOPHER ROWE, :
: : COUNTY OF OFFENSE:
: : NEW YORK
: Defendant. :
: :
-----X
SOUTHERN DISTRICT OF NEW YORK, ss.:

CHRISTOPHER DECARLO, being duly sworn, deposes and says that he is a Task Force Officer with the Drug Enforcement Administration ("DEA"), and charges as follows:

COUNT ONE

(Possession with Intent to Distribute Controlled Substances)

1. On or about August 24, 2022, in the Southern District of New York and elsewhere, Paul Christopher Rowe, the defendant, intentionally and knowingly distributed and possessed with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

2. The controlled substance involved in the offense was 400 grams and more of mixtures and substances containing a detectable amount of fentanyl, in violation of Title 21, United States Code, Section 841(b)(1)(A).

(Title 21, United States Code, Sections 812, 841(a)(1) and 841(b)(1)(A).)

COUNT TWO

(Narcotics Conspiracy)

3. On or about August 24, 2022, in the Southern District of New York and elsewhere, PAUL CHRISTOPHER ROWE, the defendant, and

others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

4. It was a part and an object of the conspiracy that PAUL CHRISTOPHER ROWE, the defendant, and others known and unknown, would and did distribute and possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

5. The controlled substance that PAUL CRISTOPHER ROWE, the defendant, conspired to distribute and possess with intent to distribute was 400 grams and more of mixtures and substances containing a detectable amount of fentanyl, in violation of Title 21, United States Code, Section 841(b)(1)(A).

(Title 21, United States Code, Section 846.)

The bases for my knowledge of the foregoing charge are, in part, as follows:

6. I am a Task Force Officer with the DEA and have been personally involved in the investigation of this matter. This affidavit is based upon my personal participation in the investigation, my examination of reports and records, and my conversations with other law enforcement agents and other individuals. Because this affidavit is being submitted for the limited purpose of demonstrating probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

7. I have learned the following from my involvement in the investigation, law enforcement surveillance, and my conversation with the confidential source ("CS-1")¹ described below:

¹ CS-1 has been providing information to the DEA since in or about 2017. CS-1 was previously convicted of narcotics offenses. CS-1 is providing information to law enforcement in exchange for financial and immigration benefits. Information provided by CS-1 has been found reliable and corroborated by, among other things, phone records and electronic evidence, and has led to multiple arrests and seizures of narcotics.

a. During the week of August 15, 2022, CS-1 met with an individual ("CC-1") in Manhattan, New York to discuss the purchase of fentanyl. Following that meeting, CC-1 provided CS-1 with a phone number (the "Phone Number") that CS-1 could use to arrange the purchase of fentanyl.

b. CS-1 spoke to an individual using the Phone Number, and they agreed to meet on West 46th Street to complete the purchase of fentanyl; the individual using the Phone Number also provided a description of the vehicle he would be driving to the meeting.

c. On or about August 24, 2022, at approximately 2:45 p.m., CS-1 met with the individual using the Phone Number to purchase fentanyl. At that time, CS-1 entered the back seat of a 2002 Black Dodge Ram 1500 pickup truck (the "Vehicle") parked in front of 305 W. 46th Street in Manhattan, New York. Sitting in the driver's seat of the Vehicle was a person later identified as PAUL CHRISTOPHER ROWE, the defendant.

d. While in the Vehicle, PAUL CHRISTOPHER ROWE, the defendant, showed CS-1 a package (the "Package") and indicated that the Package contained fentanyl:



e. After a few minutes, CS-1 exited the Vehicle and indicated to law enforcement that PAUL CHRISTOPHER ROWE, the defendant, was in the possession of fentanyl.

f. Moments after CS-1 exited the Vehicle, law enforcement approached the Vehicle and placed PAUL CHRISTOPHER ROWE, the defendant, under arrest.

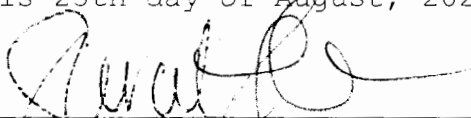
g. A search of the Vehicle led to the recovery of the Package; its contents field-tested positive for fentanyl and weighed approximately one kilogram.

WHEREFORE, I respectfully request that PAUL CHRISTOPHER ROWE, the defendant, be imprisoned or bailed, as the case may be.



CHRISTOPHER DECARLO
Task Force Officer
Drug Enforcement Administration

Sworn to before me
this 25th day of August, 2022



THE HONORABLE SARAH L. CAVE
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK